

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

KATHLEEN WILLIAMS,

Plaintiff,

v.

BOARD OF EDUCATION OF THE CITY
OF CHICAGO and CHRISTINE MUNNS,
individually and as an agent of defendant
Board

Defendants.

No. 07 C 6997

Judge George Lindberg

Magistrate Judge Schenkier

AFFIDAVIT OF ELAINE K.B. SIEGEL IN SUPPORT OF
JOINT MOTION TO EXTEND DISCOVERY

Elaine K.B. Siegel states on oath as follows:

1. I am counsel of record in the above-captioned matter, and have personal knowledge of the following facts, to which I would testify if called as a witness at trial.
2. In this case, Plaintiff alleges, *inter alia*, that CPS terminated her employment as a second grade teacher at Sauganash Elementary School because of her pregnancy, and in retaliation for filing a complaint with her local union alleging pregnancy discrimination.
3. Defendants have denied these allegations.
4. Discovery is currently scheduled to end on August 6, 2008. See March 19, 2008, order, attached hereto as Exhibit A.
5. The parties have been diligently pursuing discovery. However, CPS counsel has informed Plaintiff that numerous witnesses in this matter are either parents or teachers at Sauganash Elementary School, a CPS facility, and have been unavailable for depositions due to

vacation.

6. The Sauganash Elementary School academic year does not begin until September 2, 2008. In the interim, CPS states it is unable to make many witnesses are available for deposition.

7. CPS counsel has additionally stated that its teachers will be unavailable for depositions the first two weeks of school, when they have additional planning and administrative tasks. CPS counsel represents that during this time period, it is particularly important that students become familiar with their teachers and establish a daily routine.

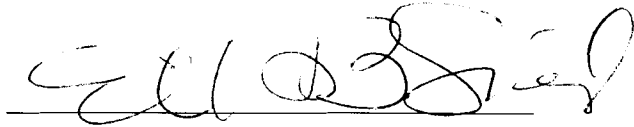
8. The Plaintiff's initial depositions of defense witnesses have revealed numerous additional witnesses, whose relevance to the case was not previously known to Plaintiff. Plaintiff anticipates that she must depose approximately a dozen additional witnesses, some of whom are currently unavailable.

9. Defendants advise that they also anticipate deposing additional witnesses.

10. It is necessary for Plaintiff to conduct discovery into student and faculty information that CPS deems confidential. CPS has denied discovery of any information regarding student records, comparable employees' evaluations, personnel records, and disciplinary records without a protective order. As of this date, July 31, 2008, this Court has entered the parties' agreed protective order.


11. In addition, Plaintiff's counsel has a one- to two- week jury trial that begins September 17, 2008, in the Circuit Court of Cook County, on *Antonio Vernon v. University of Chicago*, 02L 015749.

FURTHER AFFIANT SAYETH NOT.

A handwritten signature in black ink, appearing to read "Elaine Siegel", written over a horizontal line.

Elaine Siegel

Signed and sworn to before me,
Notary Public of Cook County, Illinois,
on this 31st day of July 2008.

A handwritten signature in black ink, appearing to read "Kristine Capua", written over a horizontal line.

Notary Public

